## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

CHEF ALESSANDRO PIROZZI, INC. and PIROZZI ENTERPRISES, LLC *Plaintiffs*,

No. 2:22-cv-00902-DG-AYS

v.

UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO AMENDED COMPLAINT

CARDCONNECT, LLC and FISERV, INC.

**Defendants** 

Defendants CardConnect, LLC and Fisery, Inc. (collectively "Defendants") respectfully request a fourteen-day extension of time, up to and including April 29, 2022, for Defendants to answer, move, or otherwise respond to Plaintiffs' Amended Complaint and Jury Trial Demand (the "Amended Complaint"). As grounds for this Motion, Defendants state as follows:

- 1. On March 4, 2022, Plaintiffs filed their Request for Adjournment and advised the Court that they intended to file their amended complaint on or before March 25, 2022. (ECF No. 20.)
- 2. Thereafter, Plaintiffs requested an extension to file their amended complaint on or before April 1, 2022, which Defendants agreed to.
  - 3. On April 1, 2022, Plaintiffs filed their Amended Complaint. (ECF No. 23.)
- 4. Defendants' current deadline to answer or otherwise respond to the Amended Complaint is April 15, 2022.
- 5. Defendants need additional time to review and analyze Amended Complaint, which alleges new causes of action.
- 6. This is Defendants first request for an extension to answer or otherwise respond to the Amended Complaint.
  - 7. Plaintiffs have consented to the requested extension.

8. This request is made in good faith and for good cause, and not for the purposes of delay.

Wherefore, Defendants request the Court grant an extension of time, up to and including April 29, 2022, for Defendants to answer or otherwise respond to the Amended Complaint.

Dated: April 13, 2022 POLSINELLI PC

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Attorney for Defendants

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via ECF and electronic mail on the all counsel of record this 13th day of April, 2022:

/s/ John W. Peterson	
Attorney for Defendants	